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# **EXHIBIT 54**

**EXHIBIT FILED UNDER SEAL**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES,                    )  
INC., PASSENGER SEXUAL                    ) CASE NO. 3:23-MD-03084-CRB  
ASSAULT LITIGATION                         )

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ORAL AND VIDEOTAPED 30(b)(6) DEPOSITION OF  
UBER TECHNOLOGIES, INC., RAISER LLC,  
AND RAISER-CA, LLC, by and through  
MARIANA ESTEVES

July 15, 2025

1 And on Page 4, you'll see here that we  
2 have some definitions. If we scroll down just a little  
3 bit.

4 Okay. So under Teen Notes, for example,  
5 you'll see that it says: [REDACTED]  
6 [REDACTED] - this is the only product  
7 difference!

8 Do you see that?

9 A. Yes.

10 Q. And in the second-to-last bullet point, it  
11 says: As of today, [REDACTED]

12 [REDACTED]

13 Do you see that?

14 A. Yes, I see that.

15 Q. So it looks like, [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED] Do you see that?

19 A. No, that's not what it says.

20 Q. What is your understanding of what this says?

21 A. [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

1 Q. [REDACTED]

2 [REDACTED]

3 A. Yeah.

4 Q. Okay. Understood.

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 Q. Right.

17 Now, I think you have, in your binder that  
18 you brought with you, a deposition aid that explains all  
19 the different safety features; is that right?

20 A. Yes.

21 Q. Okay.

22 MS. GOLDENBERG: So let's take this  
23 document down, and let's put up Tab 10, please.

24 We'll mark this as Exhibit 1581.

25 Q. (By Ms. Goldenberg) And this is part of the

1 would benefit in precision in any way. Actually, in  
2 this case, recall in any way. That's what it says.  
3 Like, it's data exploration.

4 Q. And do you know what the results of this  
5 exploration were?

6 A. I don't know the exact results. I know that we  
7 didn't make any changes, and [REDACTED]  
8 [REDACTED] And from that, I can deduct  
9 that it didn't make a difference.

10 Q. Okay. So sitting here today, [REDACTED]  
11 [REDACTED] even after it was  
12 considered, right?

13 A. [REDACTED], correct.

14 Q. [REDACTED]  
15 [REDACTED]

16 A. As of now, I'm not aware of those plans, but  
17 who knows in the future we can do that. But through  
18 data exploration, we understand that this is relevant  
19 enough.

20 MS. GOLDBERG: Okay. Let's take this  
21 document down.

22 Q. (By Ms. Goldenberg) And we discussed a little  
23 bit earlier the -- the app flow for RideCheck, where the  
24 first step is for the passenger to get a push  
25 notification on their phone, right?

1 A. (Witness nods.)

2 Q. And then the next step would be that if, after  
3 [REDACTED], the passenger hadn't responded, they  
4 would get a robocall from Uber, correct?

5 A. True.

6 Q. And if a passenger does not respond to that  
7 robocall, then nothing happens after that, correct?

8 A. Correct.

9 Q. [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 A. We are -- [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 For those cases, [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 Q. But sitting here today, as of right now, no  
21 matter how risky a ride is or what sort of risk factors  
22 Uber has identified for a ride, nothing happens  
23 differently if a passenger doesn't answer a robocall,  
24 right?

25 A. [REDACTED]

1 proactively reach out to everyone that has ever had a  
2 RideCheck trigger because the individual existing  
3 heuristics today have very little precision.

4 Q. All right. Ms. Esteves, I do want to make sure  
5 that we just answer the question that I ask you, which  
6 is: Uber does not investigate midway drop-offs merely  
7 because the rider was female, correct?

8 A. We don't investigate any midway drop-offs if we  
9 didn't get a "get help" signal from them, if they're  
10 women or men.

11 Q. Okay. And Uber also doesn't investigate a  
12 midway drop-off simply because it finds out that the  
13 ride occurred late at night, right?

14 A. Can you repeat the question?

15 Q. Uber also doesn't investigate a midway drop-off  
16 if it knows the ride occurred late at night, correct?

17 A. We don't proactively investigate any midway  
18 drop-offs if the rider or driver didn't signal to us  
19 that they needed support, regardless of time of day.

20 Q. And Uber doesn't do any follow-up with a rider  
21 later, after getting a midway\_dropoff notification, to  
22 find out what happened, right?

23 A. If the rider didn't tell us that he needed  
24 support, we don't do any follow-up for any RideCheck  
25 because the precision is very low.



1 options available to them. If they decide that they  
2 need to take action, they have all of the options ready  
3 to go, just one tap away.

4 Q. Right.

5 And my question wasn't about the act- --  
6 the action that the passenger would take. My question  
7 was about the action that Uber would take.

8 So outside of sending a push notification  
9 and potentially making a robocall if it has been longer  
10 than three minutes, tell me everything Uber does to  
11 investigate a long stop to ensure that a sexual assault  
12 or a sexual misconduct did not happen on that ride.

13 A. So from an investigation perspective, it's  
14 not -- we don't investigate proactively any RideCheck  
15 trigger that -- for which riders and drivers didn't tell  
16 us that they needed support, because the Precision is  
17 very low.

18 Q. Did Uber systematically monitor the rider's  
19 location when there was GPS data and where there was an  
20 early drop-off?

21 A. Can you repeat the question, please?

22 Q. Sure.

23 If Uber receives an early drop-off  
24 notification from RideCheck, is there any action that  
25 they take to then monitor the rider's GPS location?